REMARKS

This paper is being submitted in response to the Office Action mailed in the application on October 5, 2005. Claims 1-6, 10-27, 31-40 and 43 are pending. Independent claims 1, 22, 39, 40 and 43 have been amended.

The Examiner has rejected applicant's claims 1-6, 9-16, 19-27, 30-37 and 39-43 under 35 U.S.C. § 103(a) as being unpatentable over Patton et al. (U.S. Patent No. 6,408,301) in view of Jernigan, IV et al. (U.S. Patent No. 5,574,907) further in view of Srivastava et al. (U.S. Patent No. 6,549,922). The Examiner has rejected applicant's claims 17 and 18 under 35 U.S.C. § 103(a) as being unpatentable over the Patton et al. patent in view of Jernigan, IV et al. further in view of Srivastava et al. as applied to claims 1-6, 9-16, 19-27, 30-37 and 39-43, and further in view of Levy et al. (U.S. Patent No. 6,505,160). The Examiner's rejections are respectfully traversed.

At the outset, applicant wishes to thank the Examiner for the courtesies extended to applicant's undersigned attorney in the telephone interview conducted with the Examiner on December 8, 2005. An Interview Summary was mailed on December 14, 2005 and applicant agrees with what was stated in the Summary and this Response further summarizes what was discussed in the interview and is a formal request for reconsideration.

During the interview, the features of claim 1 were discussed as representative of applicant's independent claims 1, 22, 39, 40 and 43. In discussing claim 1, the first and second storage steps of storing metadata and content information, respectively, were reviewed. It was emphasized with respect to the first storage step that metadata was stored into a first block storage area that is a predetermined continuous area capable of storing metadata of a plurality

of files. FIG. 5 of the application was noted to illustrate the first storage area 503. With respect to the second storage step, it was emphasized that the content data was stored in a second block storage other than the first storage area and the area 504 in FIG. 5 was noted to illustrate this second storage area. Finally, the third storage step of storing the linking information was discussed and it was emphasized that the link information is stored in an area adjacent the area where corresponding metadata is stored.

After discussing claim 1, it was pointed out to the Examiner that while the Patton, et al. patent discloses storing image data, metadata and link data, none of the passages cited by the Examiner disclose storing the metadata in a first block area as claimed, storing the image data in a second block area other than the first block area as claimed and storing the link information adjacent the corresponding metadata as claimed. Column 4, lines 20-28, column 4, lines 39-45, column 4, line 43 and column 4, lines 45-47 of the Patton, et al. patent were particularly pointed out and it was emphasized that these passage merely disclose the storing of image data, metadata and link data generally, without specifics as to any type of location.

The Examiner also mentioned that the Examiner's Primary Examiner had advised the Examiner that image data and metadata are stored in separate block areas in the Patton, et al. patent. It was noted to the Examiner that if the Patton, et al. patent does disclose separate block areas then the particular passage or passages in the patent that states this should be specifically noted. In any case, it was pointed out that it was believed that there was no disclosure of a first block area that was a continuous area for storing the metadata, a second block area other than the first area for storing content data, and of storing linking data adjacent to the corresponding metadata.

In this regard, applicants have again reviewed the Patton, et al. patent and the patent extensively discusses at column 4, line 20, through column 5, line 8, the storage of metadata along with, for example, user recorded images or pre-stored graphics as picons or icons, captured still images associated with the beginning of a scene as a small version thumbnail or picon, second(s) of associated sound bytes, image file address pointers and operated index images (picons). These passages of the patent state that such image data and metadata are stored to RAM and added to the visual scene index directory. The passages further mention the linking of sound bytes and metadata, the development of a master or sub directory picture thumbnail image-Picon, that the master index is saved to flash memory (a fixed or removable RAM disk card) and that the master index can be independent of the primary picture storage media or contained as a copy in the primary picture storage medium.

However, none of the above discussion is a teaching or suggestion that metadata be stored into a first block storage area that is a predetermined continuous area capable of storing metadata of a plurality of files, that content data be stored in a second block storage area other than the first storage area and that linking information be stored in an area adjacent the area where corresponding metadata is stored.

With respect to the Jernigan, IV, et al. patent, it was pointed out that while the patent describes defragmenting a disc and placing data of a file in adjacent clusters, it was not clear how the teachings of this patent could be applied to the Patton, et al. system. Also, it was noted that the Examiner was trying to apply the Jernigan, IV, et al. patent only to the metadata in the Patton, et al. patent and that the Jernigan, IV, et al. patent would have to be applied to the image data, linking data and all the other data mention in the patent as well as the metadata. If

that were done it would not result in a storage scheme as in claim 1 with first and second block storage areas for the metadata and content data, respectively, and the linking data being situated adjacent to the corresponding metadata.

Finally, it was pointed out that the Srivastava, et al. patent simply discloses separating metadata from media data, but that this patent did not appear to have application to the Patton, et al patent. Moreover, it would not teach or suggest in the Patton, et al. patent that metadata be stored into a first block storage area that is a predetermined continuous area capable of storing metadata of a plurality of files, that content data be stored in a second block storage area other than the first storage area and that linking information be stored in an area adjacent the area where corresponding metadata is stored.

Based on the above, it is submitted that applicant's independent claims 1, 22, 39, 40 and 43, and their respective dependent claims, patentably distinguish over the Patton, et al., Jernigan, IV, et al. and Srivastava, et al. patents. The cited Levy, et al. patent adds nothing to change this conclusion.

In view of the above, it is submitted that applicant's claims patentably distinguish over the cited art of record. Accordingly, reconsideration of the claims is respectfully requested.

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Respectfully submitted,

John J. Torrente

COWAN, LIEBOWITZ & LATMAN, P. C.
1133 Avenue of the Americas
New York, New York 10036
T (212) 790-9200

John J. Torrente
Reg. No. 26,359
Attorney of Record